

Stroud District Council
Received
22 JAN 2020
Development Services

ISSUES WITH THE PROPOSED DEVELOPMENT AT WISLOE GREEN

[Redacted]
21st January 2020

I do not live in Slimbridge but regularly visit my daughter who lives in the village. We very much enjoy the relaxed and rural charm of the area and was very disturbed by the proposed development to build 1500 new homes in Slimbridge Parish and the affect that it will have on a beautiful area. Below I have listed my thoughts and concerns with a development which I strongly oppose.

Impact on views from the Area of Outstanding National Beauty (AONB). We often enjoy the views from the Cotswold Edge. The nearest part of the AONB is at Stinchcombe Hill less than 1 mile away. The proposed settlement will ruin views from both the Cotswold and Forest of Dean AONB's in stark contrast to SDC's commitment to protect these areas and views.

SA 8.1: Does the Plan protect and enhance the District's sensitive and special landscapes (including the Cotswolds AONB), and townscapes?

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

The proposed development does not.

Impact to the Rural Community - The Stroud area is officially designated a Rural District.

SDC's Core Strategy states that is "aims to protect and enhance the natural and built environment of the district". This proposal will destroy the very nature of what makes it a wonderful place to live.

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner?

The proposed development does not.

Coalescence – The proposed development will coalesce with Slimbridge, Gossington and Cambridge into a single amorphous town. Furthermore, the expansion of Cam will effectively result in one urban sprawl from the Cotswold ANOB right through to the Severn Valley. The M5 motorway cannot be considered a natural break between the two settlements and therefore, this goes against all principles of good planning

SDC policy ES7. Paragraph 6.43 notes that "the principle pressure on the landscape arising from new development is erosion of the separate identity, character and functional amenity of settlements and the setting, and impacts on the open countryside".

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 possess the questions

SA 5.3: Does the Plan safeguard and enhance the identity of the District's existing communities and settlements?

SA8, 8.4: Does the Plan prevent coalescence between settlements?

SA 8.5: Does the Plan protect and enhance the District's natural environment assets.

The proposed development fails to meet any of the above criteria.

Agricultural Land Classification – Natural England classifies the land within Slimbridge Parish as Grade 2 – (very good agricultural land) and therefore should not be considered for development. The land in question has produced crops of high quality and high yield which contrasts with the recent suggestion of regrading the land to 3b in the recent survey commissioned by the ECT & GCC.

NPPF 170 states "*Planning policies and decisions should contribute to and enhance the natural and local environment by: "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland"*

SA 13.5 asks, Does the Plan reduce the loss of soil and high grade agricultural land to development?

It does not.

Conservation – NPPF 175 states; "*When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

There are records and sightings of British Trust for Ornithology (BTO) Red Data listed birds including Curlew and Lapwing. These birds require large open plains to feed and roost. In addition to this European Nightjar, Lesser Redpoll, Long Eared Bats, Dormice and Palmate Newts have been sighted in this area all of which are highly protected. SDC's Ecologic appraisal recognise these sightings and conclude that further in-depth surveys will need to be undertaken.

This land has an important role in the Ecology of this area and should be preserved accordingly.

Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 possess the following questions: -

SA 7.1: Does the Plan avoid adverse effects on designated and undesignated biodiversity and geodiversity assets within and outside the District, including the net loss and fragmentation of green infrastructure and damage to ecological networks?

SA 7.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?

SA 7.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?

The proposed development does not.

Noise Levels - Sandwiched between the M5, A38, A4135, & the Railway Line, noise levels have been measured well beyond permitted levels (50 db). The recent survey undertaken on behalf of ECT and GCC show levels in excess of 80 dB.

NPPF 180 states; *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”;*

Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 possess the following questions: -

SA 5.1: Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?

SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership?

The proposed development does not

ENVIRONMENTAL - CARBON NEUTRAL 2030 (CN2030)

Environmental issues are of huge importance and the proposed development in the Slimbridge Parish will have a massive impact on the area across the full spectrum of environmental considerations.

The Draft Local Plan was produced in advance of CN2030 and the Proposed site in Slimbridge Parish falls short across numerous policies within CN2030.

SDC Policy CP14 High quality sustainable development states: -

High quality development, which protects, conserves and enhances the built and natural environment, will be supported.

Development will be supported where it achieves the following:

- 2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status*
- 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure*
- 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development*
- 5. An appropriate design and appearance, which is respectful of the surroundings,*
- 7. No unacceptable adverse effect on the amenities of neighbouring occupants*
- 8. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including demonstrating the relationship to green infrastructure on site and wider networks)*
- 11. Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development*
- 14. It is at a location that is near to essential services and good transport links to services by means other than motor car.*

The proposed site in the Slimbridge Parish falls short on these items.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 SA10 possess the question

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?

SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?

The proposed development In Slimbridge Parish falls significantly short in both areas.

Conclusion

The proposed development in Slimbridge Parish falls short in so many areas highlighted within CP14 and in particular CN2030 that it is difficult to see how it can conceivably stay within the local plan.

In excess of 3000 new homes – this is the total number of new homes either planned, in planning, or proposed to be built within Cam and Slimbridge Parishes making it the single largest house concentration in the district. The only separation between the Cam and the proposed Slimbridge Parish developments will be the M5 motorway which can hardly be classified as a clear and natural divide. Whilst assessing the impact on the environment, service infrastructure and road infrastructure it is only right for SDC to consider this as one big development and not to dilute the issues by stating that it is two!

Pollution Levels – NPPF 180 States *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”.*

The M5, A38, A4135 & railway impacts on current and future residents with highly toxic gases which cannot be mitigated. This will only increase with the proposed developments at Cam & Slimbridge Parish producing around 3000 further commute journeys. There are no feasible measures available that will protect future residents from these toxic fumes being that they will sandwich between 3 major roads and a rail track.

Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 possess the following questions: -

SA 5.1: Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?

SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership?

The proposed development does not.

There are well known issues with the quality of the drinking water within Slimbridge Parish and the Sustainability Appraisal Report identifies that Drinking Water Safeguarding Zones are present in the River Cam and the surrounding areas.

Sustainability Appraisal Report for the Stroud Draft Local Plan 2019:

SA 11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.

SA 11.3: Does the Plan minimise inappropriate development in Nitrate Vulnerable Zones, Drinking Water Safeguard Zones and Source Protection Zones?

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The answer is no because the report very worryingly goes on to states the following: -

4.68 Drinking Water Safeguarding Zones are present in the District around Cam where a high level of strategic growth is to be accommodated. A high level of growth in this area could adversely impact water quality in the area.

5.28 Only the new settlement at Wisloe is expected to have an adverse impact on water quality in the District given that it lies within an SPZ. As such a significant negative effect is expected in relation to SA objective 11:

Conclusion

It is clear that there SDC and the developers are aware of a with water quality problem for the Proposed development within Slimbridge Parish. The residents of Slimbridge Parish are very concerned about this particularly when considering the total growth of over 4000 homes between Slimbridge and Cam Parishes in a Drinking Water Safeguarding Zone.

Rural Settlement Classifications – SDC's own recommendations are to priorities Tier 1 and Tier 2 areas (towns and large villages) whilst Slimbridge is Tier 3b and Cambridge Tier 4. SDC's own Settlement Role and Functions Study in 2018 states that Slimbridge Village "may benefit from some planned development, targeted and scaled to meet local housing needs". If it is now SDC's policy to build on or near Tier 3b and 4 settlements this then surely opens for consideration a multitude of sites previously disregarded due to them being lower Tier Settlements. Revisiting these settlements would provide the opportunity for the preferred dispersal option of house building

Alternative sites – I oppose SDC's proposal to build the majority of their housing commitments in the Berkeley Vale creating two large dormitory settlements. A fairer allocation should be sought through dispersal across the whole of the District as was the original request from residents' feedback. This will have the effect of spreading the load across the District making it more manageable and therefore creating less impact. If larger sites are required to meet any shortfall these should be sought closer to employment in areas such as Hardwicke, Stonehouse and Whaddon.

If SDC feels it can support a development, in Tier 3b and 4 settlements ignoring the consequences of such a site then they have a duty to reconsider the overall plan and to now include for consideration land adjacent to all Lower Tier Settlements

Conclusion - I do not believe that due diligence has been followed and that this development is being supported as an easy fix to a difficult problem. I believe that SDC are ignoring many of its own policy's, recommendations and requirements in supporting a large development in Slimbridge Parish.